

Hearing Date: July 25, 2018 at 9:30 a.m. (AST)

Objection Deadline: July 12, 2018

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re:

PROMESA

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

Title III

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

(Jointly Administered)

Debtors.<sup>1</sup>

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**NOTICE OF MOTION OF THE INDEPENDENT INVESTIGATOR  
FOR AN ORDER: (I) ESTABLISHING PROCEDURES FOR RESOLVING  
ANY CONFIDENTIALITY DISPUTE IN CONNECTION WITH PUBLICATION  
OF THE INDEPENDENT INVESTIGATOR'S FINAL REPORT; (II) APPROVING  
THE DISPOSITION OF DOCUMENTS AND INFORMATION; (III) RELIEVING  
THE INDEPENDENT INVESTIGATOR FROM CERTAIN DISCOVERY  
OBLIGATIONS; (IV) EXCULPATING THE INDEPENDENT INVESTIGATOR IN  
CONNECTION WITH THE INVESTIGATION AND PUBLICATION  
OF THE FINAL REPORT; AND (V) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that a hearing on the *Motion of the Independent Investigator for an Order: (I) Establishing Procedures for Resolving Any Confidentiality Dispute in connection with Publication of the Independent Investigator's Final Report; (II) Approving the Disposition of Documents and Information; (III) Relieving the Independent Investigator from Certain Discovery Obligations; (IV) Exculpating the Independent Investigator in connection with the Investigation and Publication of the Final Report; and (V) Granting Related Relief* (the "Motion") (ECF No. 3427), filed by Kobre & Kim LLP, the independent investigator (the "Independent Investigator") retained by the Financial Oversight

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<sup>1</sup> The debtors in the above referenced cases (the "Title III Cases"), along with each debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each debtor's federal tax identification number, as applicable, are the: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284(LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (iv) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (collectively, the "Debtors").

and Management Board for Puerto Rico (the “Oversight Board”), acting by and through the Special Investigation Committee of the Oversight Board (the “Special Investigation Committee”),<sup>2</sup> will be held before the Honorable Laura Taylor Swain, the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767 on **July 25, 2018 at 9:30 a.m. (Atlantic Standard Time)**.

**PLEASE TAKE FURTHER NOTICE** that any response or objection (any “Objection”) to the Motion must be in writing, must conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of Puerto Rico, must be filed with the Court (a) by attorneys practicing in the Court, including attorneys admitted *pro hac vice*, electronically in accordance with Rule 5 of the Local Rules for the District of Puerto Rico, and (b) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF), to the extent applicable, and must be served on the Independent Investigator and other parties in interest in accordance with the Court’s *Order (A) Imposing and Rendering Applicable Local Bankruptcy Rules to These Title III Cases, (B) Authorizing Establishment of Certain Notice, Case Management, and Administrative Procedures, and (C) Granting Related Relief*, as amended (ECF Nos. 249, 262, 1065, 1512, 2839, and collectively, the “Case Management Order”) no later than **July 12, 2018 (the “Objection Deadline”)**.<sup>3</sup>

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<sup>2</sup> The Special Investigation Committee comprises of Members Ana J. Matosantos, David A. Skeel, and Judge Arthur J. Gonzalez (Ret.), and is charged with pursuing investigations pursuant to the authority granted to the Oversight Board by PROMESA Section 104(o) and such other authority vested in the Oversight Board under PROMESA.

<sup>3</sup> See Order Granting Creditors’ Committee’s Motion for Entry of Briefing Schedule Regarding Investigator’s Proposed “Exit Plan” dated July 2, 2018, entered by Judge Judith Gail Dein, in the Debtors’ Title III Cases (ECF No. 3409).

**PLEASE TAKE FURTHER NOTICE** that any reply in support of the relief sought in the Motion or any response to an Objection must be filed and served in accordance with the Case Management Order by no later than **July 20, 2018**.<sup>4</sup>

**PLEASE TAKE FURTHER NOTICE** that if no Objection to the Motion is timely filed and served in accordance with the Case Management Order by the Objection Deadline, the relief requested shall be deemed unopposed, and the Court may enter an order granting the relief sought in the Motion without a hearing.

Dated: July 3, 2018  
San Juan, Puerto Rico

/s/ D. Farrington Yates

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*The Independent Investigator*

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<sup>4</sup> *See id.*

A&S LEGAL STUDIO, PSC

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